PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY
and EVANSVILLE EPA

Mead Johnson & Company
2400 West Lloyd Expressway
Evansville, Indiana 47721

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T163-7142-00015	
Issued by: Original Signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 22, 2002 Expiration Date: March 22, 2007

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Evansville EPA. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a pharmaceutical and nutritional product formulation plant.

Responsible Official:	James L. Long
Source Location:	2400 West Lloyd Expressway, Evansville, Indiana 47721
Mailing Address:	2400 West Lloyd Expressway, Evansville, Indiana 47721
General Source Phone Number:	(812) 429-5000
County:	Vanderburgh
SIC Code:	2834, 2099
Operation Permit No.:	T163-7142-00015
Permit Reviewer:	Holly M. Stockrahm
Source Location Status:	Maintenance for ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) natural gas fired boiler with low NOx burner and flue gas recirculation system identified as CSUP-1 (boiler 8), maximum capacity rated at 98.6 million British thermal units per hour fired with natural gas, rated at 93.9 million British thermal units per hour fired with No. 2 distillate fuel oil, maximum capacity rated at 80,000 lbs saturated steam per hour at 400 psig operating pressure and 400 to 450^0 F, located in building 66, and exhausting at one (1) stack identified as CSUP-S_1. (Constructed in 1998)

(b) One (1) natural gas fired boiler with low NOx burner and flue gas recirculation system identified as CSUP-2 (boiler 9), maximum capacity rated at 98.6 million British thermal units per hour fired with natural gas, rated at 93.9 million British thermal units per hour fired with No. 2 distillate fuel oil, maximum capacity rated at 80,000 lbs saturated steam per hour at 400 psig operating pressure and 400 to 450^0 F, located in building 66, and exhausting at one (1) stack identified as CSUP-S_2. (Constructed in 1998)

(c) One (1) natural gas fired boiler with low NOx burner and flue gas recirculation system identified as CSUP-3 (boiler 10), maximum capacity rated at 98.6 million British thermal units per hour fired with natural gas, rated at 93.9 million British thermal units per hour fired with No. 2 distillate fuel oil, maximum capacity rated at 80,000 lbs saturated steam per hour at 400 psig operating pressure and 400 to 450^0 F, located in building 66, and exhausting at one (1) stack identified as CSUP-S_3. (Constructed in 1998)

(d) One (1) diesel fuel oil fired emergency electric generator identified as CSUP-4, rated at 7.20 million British thermal units per hour (MMBtu/hr) or capable of maximum 750 KW output, located near the southeast corner of building 66, and exhausting at one (1) stack identified as CSUP-S_4. (Constructed in 1998)

(e) One (1) fixed roof tank with a maximum design capacity of 10,000 gallons identified as

CSUP-F1, located east of building 66, and will be used to store petroleum products with a maximum vapor pressure of 0.009 psia at 68^0 F. (Constructed in 1998)

(f) One (1) reciprocating diesel fuel oil fired emergency electric generator, identified as backup generator #1, used to provide backup power to the computer center in case of a power outage, capable of a maximum 750 kilowatt (KW) output, located in building 5, and exhausting at one (1) stack, identified as stack 1. (Constructed in 1985)

(g) One (1) reciprocating diesel fuel oil fired emergency electric generator, identified as backup generator #2, used to provide backup power to the computer center in case of a power outage, capable of a maximum 1000 kilowatt (KW) output, located south of building 8, and exhausting at one (1) stack, identified as stack 1. (Constructed in 1992)

(h) One (1) reciprocating diesel fuel oil fired emergency electric generator, identified as backup generator #3 used to provide backup power to the computer center in case of a power outage, capable of a maximum 750 kilowatt (KW) output, located north of building 52, and exhausting at one (1) stacks, identified as stack 1 and stack 2. (Constructed in 1992)

(i) One (1) reciprocating diesel fuel oil fired emergency electric generator, identified as backup generator #4 used to provide backup power to Bldg. 48 R & D Laboratory in case of power outage, capable of 500 KVA (405HP) output located north of Building 48 and south of Building 63, and exhausting at one (1) stack identified as stack 1. (Constructed in 2001)

(j) Eight (8) weigh stations, identified as 1 through 8, located in room 105 of building 9, each with PM controlled by a rotoclone, six (6) with hepafilter systems, with rotoclones located on the roof. (Constructed in 1997)

(k) Two (2) tablet coating systems, identified as 2025 and 2026, located in room 119 of building 9, controlled by two (2) dust collectors, identified as RTC 0032 and 0033, located on the roof. (Constructed in 1997)

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.(326 IAC 6-1-2)

(b) Other activities or categories not previously identified:

Insignificant Thresholds:
Lead (Pb) = 0.6 ton/year or 3.29 lbs/day Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxides (SO2) = 5 lbs/hour or 25 lbs/day Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NOX) = 5 lbs/hour or 25 lbs/day Volatile Organic compounds (VOC) = 3 lbs/hr or 15 lbs/day

(1) Nutritional Lodige Wet Granulation (113) (mixing process involving powders and liquids) (326 IAC 6-1-2)
(2) Pharmaceutical Lodige Wet Granulation (112) (mixing process involving powders and liquids) (326 IAC 6-1-2)
(3) High Shear Mixer (111A) (mixing process involving powders and liquids) (326 IAC 6-1-2)
(4) Fluidized Bed Dryer (110A, 111, 109) (air drying of wet granulation) (326 IAC 6-

1-2)
(5) Weigh Scales (105) (weighing of materials) (326 IAC 6-1-2)
(6) Lodige Dry Granulation (25) (mixing process involving powders and liquids) (326 IAC 6-1-2)
(7) Dump Room/Mixer (130/25A, 134/23A, 132/24A) (dumping and mixing of solid granulation) (326 IAC 6-1-2)
(8) Solids Chilsenator (131) (dry mixing of granulation) (326 IAC 6-1-2)
(9) Dry Chilsenator (126) (dry mixing of granulation) (326 IAC 6-1-2
(10) Oncology Blending (116A) (dry mixing of granulation) (326 IAC 6-1-2)
(11) Oncology Encapsulating (116A) (capsulating of dry granulation) (326 IAC 6-1-2
(12) Tray Drying Ovens (114, 115A, 103) (ovens used to dry granulations
(13) Feed Room (103D) (granulation dump room for tableting room) (326 IAC 6-1-2)
(14) Weigh Room (304) (weighing of powders via scales) (326 IAC 6-1-2)
(15) Dump Room (301, 303, 304, 305, 216, 212) (dumping of powders that feed mixing machine) (326 IAC 6-1-2)
(16) Steroid Tableting (125, 101) (tableting of granulation) (326 IAC 6-1-2)
(17) Steroid Blending (105) (mixing of granulation constituents) (326 IAC 6-1-2)
(18) Steroid Processing Room (103A) (dry blend and manual tableting) (326 IAC 6-1-2)
(19) Two (2) packaging lines (304A) (tablet packaging) (326 IAC 6-1-2)

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

(a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and Evansville EPA, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by Evansville EPA.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 NW Martin Luther King Jr. Blvd
Room 250
Evansville, Indiana 47708

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, and Evansville EPA within a reasonable time, any information that IDEM, OAQ, and Evansville EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, and Evansville EPA copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through

December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 NW Martin Luther King Jr. Blvd
Room 250
Evansville, Indiana 47708

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Evansville EPA on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, and Evansville EPA may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 NW Martin Luther King Jr. Blvd
Room 250
Evansville, Indiana 47708

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, and Evansville EPA upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and Evansville EPA. IDEM, OAQ, and Evansville EPA may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Evansville EPA makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Evansville EPA within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, and Evansville EPA may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, and Evansville EPA by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, or Evansville EPA shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or Evansville EPA has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or Evansville EPA has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permit Conditions Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 NW Martin Luther King Jr. Blvd
Room 250
Evansville, Indiana 47708

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, or Evansville EPA determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, or Evansville EPA to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, or Evansville EPA at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or Evansville EPA may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and Evansville EPA and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined

by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 NW Martin Luther King Jr. Blvd
Room 250
Evansville, Indiana 47708

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Evansville EPA on or before the date it is due.

(2) If IDEM, OAQ, and Evansville EPA, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, and Evansville EPA, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, and Evansville EPA, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, and Evansville EPA fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management

Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 NW Martin Luther King Jr. Blvd
Room 250
Evansville, Indiana 47708

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA

101 NW Martin Luther King Jr. Blvd
Room 250
Evansville, Indiana 47708

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and Evansville EPA in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]
A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, and Evansville EPA U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 NW Martin Luther King Jr. Blvd
Room 250
Evansville, Indiana 47708

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, and Evansville EPA within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee

does not receive a bill from IDEM, OAQ, and Evansville EPA the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 NW Martin Luther King Jr. Blvd
Room 250
Evansville, Indiana 47708

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 NW Martin Luther King Jr. Blvd
Room 250
Evansville, Indiana 47708

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and Evansville EPA not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and Evansville EPA, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 NW Martin Luther King Jr. Blvd
Room 250
Evansville, Indiana 47708

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a flow rate the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of

pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 NW Martin Luther King Jr. Blvd
Room 250
Evansville, Indiana 47708

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, and Evansville EPA, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, and Evansville EPA, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Response Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and Evansville EPA, upon request and Evansville EPA. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management

Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 NW Martin Luther King Jr. Blvd
Room 250
Evansville, Indiana 47708

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Evansville EPA on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Evansville EPA makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Evansville EPA within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 NW Martin Luther King Jr. Blvd
Room 250
Evansville, Indiana 47708

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Evansville EPA on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) One (1) natural gas fired boiler (using No. 2 distillate fuel oil as back up fuel) with low NOx burner and flue gas recirculation system identified as CSUP-1 (boiler 8), maximum capacity rated at 98.6 million British thermal units per hour fired with natural gas, rated at 93.9 million British thermal units per hour fired with No. 2 distillate fuel oil, maximum capacity rated at 80,000 lbs saturated steam per hour at 400 psig operating pressure and 400 to 450^0 F, located in building 66, and exhausting at one (1) stack identified as CSUP-S_1. (Constructed in 1998)

(b) One (1) natural gas fired boiler (using No. 2 distillate fuel oil as back up fuel) with low NOx burner and flue gas recirculation system identified as CSUP-2 (boiler 9), maximum capacity rated at 98.6 million British thermal units per hour fired with natural gas, rated at 93.9 million British thermal units per hour fired with No. 2 distillate fuel oil, maximum capacity rated at 80,000 lbs saturated steam per hour at 400 psig operating pressure and 400 to 450^0 F, located in building 66, and exhausting at one (1) stack identified as CSUP-S_2. (Constructed in 1998)

(c) One (1) natural gas fired boiler (using No. 2 distillate fuel oil as back up fuel) with low NOx burner and flue gas recirculation system identified as CSUP-3 (boiler 10), maximum capacity rated at 98.6 million British thermal units per hour fired with natural gas, rated at 93.9 million British thermal units per hour fired with No. 2 distillate fuel oil, maximum capacity rated at 80,000 lbs saturated steam per hour at 400 psig operating pressure and 400 to 450^0 F, located in building 66, and exhausting at one (1) stack identified as CSUP-S_3. (Constructed in 1998)

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 New Source Performance Standard, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR Part 60.40c through 60.48c, Subpart Dc] [326 IAC 12]

Pursuant to New Source Performance Standard, 40 CFR Part 60.40c through 60.48c, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, the three (3) natural gas fired (using No. 2 distillate fuel oil as back up fuel) 98.6 MMBtu/hr boilers, identified as CSUP-1, CSUP-2, and CSUP-3 have the following requirements:

(a) SO_2 emissions shall be limited to five tenths (0.5) pounds per MMBtu of heat input during distillate oil firing or that the distillate oil sulfur content be limited to five tenths (0.5) percent by weight at all times including periods of start-up, shut-down and malfunction. The source will comply with this rule by accepting a federally enforceable emission limit of 0.3 pounds per MMBtu heat input when burning No. 2 distillate fuel oil in the 98.6 MMBtu per hour boilers.

(b) When burning No. 2 distillate fuel oil, opacity shall be limited to 20 percent as a 6-minute average, except for one (1) 6-minute period per hour limited to 27 percent opacity, and except during periods of start-up, shut-down and malfunction.

D.1.2 PSD Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP 163-9713-00015, issued on August 24, 1998, and 326 IAC 2-2 and 40 CFR 52.21:

(a) NOx emissions from the 98.6 MMBtu/hr boilers identified as CSUP-1, CSUP-2 and CSUP-3 shall be limited to 0.08 pounds per MMBtu (lb/MMBtu) while burning natural gas only, (this alternate emission factor was tested and verified on November 9-12, 1999, and results in the PTE of NOx being 39 tons per year for each boiler),

(b) NOx emissions from the 93.9 MMBtu/hr boilers identified as CSUP-1, CSUP-2 and CSUP-3 shall be limited to 0.08 pounds per MMBtu (lb/MMBtu) while burning No. 2 distillate fuel oil only, (this alternate emission factor was tested and verified on November 9-12, 1999, and results in the PTE of NOx being 39 tons per year for each boiler),

D.1.3 Non-attainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2,

(a) the particulate matter (PM) content of all gaseous fuel fired steam generators (CSUP-1, 2, and 3) shall not exceed 0.01 grains per dry standard cubic foot.

(b) the particulate matter (PM) content of all liquid fuel fired steam generators (CSUP-1, 2, and 3) shall not exceed 0.15 pounds per million Btu.

D.1.4 Sulfur Dioxide Emission Limitations [326 IAC 7-1.1]

Pursuant to 326 IAC 7-1-1, the sulfur dioxide emissions from the 98.6 MMBtu per hour boilers (CSUP-1, 2, and 3), when No. 2 distillate fuel oil is used, shall be limited to 0.5 pounds per MMBtu heat input. This equates to an allowable distillate fuel oil sulfur content limit of 0.5%. Therefore, the sulfur content of the distillate fuel must be less than or equal to 0.5% in order to comply with this rule. The facility will comply with this rule by limiting distillate oil sulfur content to 0.3% or less. This condition is not federally enforceable.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, in order to demonstrate compliance with Conditions D.1.1, D.1.4, and D.1.5, the Permittee shall perform opacity and NOx testing (when burning fuel oil), and NOx testing (when burning natural gas) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

D.1.7 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:

(a) Providing vendor analysis of fuel delivered, if accompanied by a certification; or

(b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Visible Emissions Notations

(a) Visible emission notations of the boiler stack exhausts shall be performed once per shift during normal daylight operations when combusting No.2 fuel oil, and when exhausting

to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.1 and D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications;

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

(b) To document compliance with Condition D.1.8, the Permittee shall maintain records of visible emission notations of the boiler stack exhaust once per shift.

(c) All records shall be maintained in accordance with Section C - General Record Keeping

Requirements, of this permit.

D.1.10 Reporting Requirements

(a) A certification, signed by the responsible official, that certifies all of the fuels combusted during the period. The natural gas-fired boiler certification does require the certification by the Aresponsible official@ as defined by 326 IAC 2-7-1(34);

(b) The natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported.

(c) A quarterly summary of the information to document compliance with Condition D.1.1, in any compliance period when No. 2 fuel oil was combusted, and the natural gas fired boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
One (1) diesel fuel oil fired emergency electric generator identified as CSUP-4, rated at 7.20 million British thermal units per hour (MMBtu/hr) or capable of maximum 750 KW output, located near the southeast corner of building 66, and exhausting at one (1) stack identified as CSUP-S_4. (Constructed in 1998)

One (1) reciprocating diesel fuel oil fired emergency electric generator, identified as backup generator #1, used to provide backup power to the computer center in case of a power outage, capable of a maximum 750 kilowatt (KW) output, located in building 5, and exhausting at one (1) stack, identified as stack 1. (Constructed in 1985)

One (1) reciprocating diesel fuel oil fired emergency electric generator, identified as backup generator #2, used to provide backup power to the computer center in case of a power outage, capable of a maximum 1000 kilowatt (KW) output, located south of building 8, and exhausting at one (1) stack, identified as stack 1. (Constructed in 1992)

One (1) reciprocating diesel fuel oil fired emergency electric generator, identified as backup generator #3 used to provide backup power to the computer center in case of a power outage, capable of a maximum 750 kilowatt (KW) output, located north of building 52, and exhausting at one (1) stacks, identified as stack 1 and stack 2. (Constructed in 1992)
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Nitrogen Oxides (NOx) [326 IAC 2-2]

(a) The input diesel fuel oil of the electrical generator identified as CSUP-4 shall be limited to 25,643 gallons per 12 consecutive month period. This production limitation is equivalent to NO_X emissions of 4.4 tons per 12 consecutive month period, rolled on a monthly basis. Compliance with this limit ensures 326 IAC 2-2 does not apply.

(b) Two (2) 750 kW and one (1) 1000 kW electrical generators shall be limited to 2578 hours of operation per year. This limitation is equivalent to NOx emissions of 39 tons per 12 consecutive month period. Compliance with this limit ensures 326 IAC 2-2 does not apply.

D.2.2 PM10 Emission Limitations for Vanderburgh County [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the allowable particulate emissions for electrical generators shall not exceed 0.03 grains per dry standard cubic feet of air per minute when combusting diesel fuel oil.

Compliance Determination Requirements

D.2.3 NOx

Compliance with Condition D.2.1 shall be demonstrated within 30 days of the end of each month based on the total diesel fuel oil usage and generator operating hours for the most recent twelve (12) month period).

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Visible Emissions Notations

(a) Visible emission notations of the emergency generator stack exhausts shall be performed once per shift during normal daylight operations. A trained employee shall record whether

emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.5 Record Keeping Requirements

(a) To document compliance with Condition D.2.1(a), the Permittee shall maintain records of the amount of diesel fuel oil used rolled on a monthly basis.

(b) To document compliance with Condition D.2.1(b), the Permittee shall maintain records of the number of hours the two (2) 750 kW and one (1) 1000 kW electrical generators are operated rolled on a monthly basis.

(c) To document compliance with D.2.4, the Permittee shall maintain records of daily visible emission notations of the diesel fuel combustion stack exhausts required under Condition D.2.5.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 in any compliance period for (a) when No. 2 fuel oil was combusted, and (b) the number of hours that the No. 2 fuel oil fired generators were operated.

SECTION D.3 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
Eight (8) weigh stations, identified as 1 through 8, located in room 105 of building 9, each with PM controlled by a rotoclone, six (6) with hepafilter systems, with rotoclones located on the roof. (Constructed in 1997)

Two (2) tablet coating systems, identified as 2025 and 2026, located in room 119 of building 9, controlled by two (2) dust collectors, identified as RTC 0032 and 0033, located on the roof. (Constructed in 1997)

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(d), the particulate matter (PM) content of the following eight (8) weigh stations, identified as 1 through 8, located in room 105 of building 9, and two (2) tablet coating systems, identified as 2025 and 2026, located in room 119 of building 9, shall be limited to 0.03 grain/dry standard cubic foot.

D.3.2 Pharmaceutical MACT NESHAPs [40 CFR Part 63, Subpart GGG]

The source potential to emit of HAPs shall not exceed 10 tons per 12 consecutive month period of a single HAP and 25 tons per 12 consecutive month period of a combination of HAPs. Compliance with this limit ensures that 40 CFR Part 63, Subpart GGG, does not apply.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.4 HAPs

Compliance with Condition D.3.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period).

D.3.5 PM

The rotoclones and dust collectors for PM control shall be in operation at all times when the weighing and coating processes are in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.6 Monitoring

The weigh stations, identified as 1 through 8, (controlled by rotoclones) and the two (2) tablet coating systems, identified as 2025 and 2026, can filling, pouch filling, packaging, and tablet forming, have applicable compliance monitoring conditions as specified below:

(a) Visible emissions notations of the processes above shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the

process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(b) Parametric Monitoring for the dust collectors only:

(1) The Permittee shall take readings of the total static pressure drop across the dust collectors, as least once per week. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the dust collector shall be maintained within the range of 3 to 6 inches of water. The Preventive Maintenance Plan for the dust collector when the pressure reading is outside of this range for any one reading.

(2) An inspection shall be performed each calendar quarter of the dust collectors. Defective dust collectors shall be replaced. A record shall be kept of the results of the inspections and the number of dust collectors replaced.

(3) In the event that a dust collector's failure has been observed:

(A) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.

(B) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

(c) Parametric Monitoring for the water rotoclones only:

(1) The Permittee shall record the pressure of water to the rotocyclones at least once daily when the respective process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the water pressure rate shall be maintained within the range of 40 to 60 psi or a range established during the latest stack test.

(2) An inspection shall be performed each calendar quarter of the rotoclones. Defective rotoclones shall be replaced. A record shall be kept of the results of the inspections and the number of rotoclones replaced.

(3) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping Requirements

(a) To document compliance with Condition D.3.1, the Permittee shall:

(4) maintain records of daily visible emission notations of the weighing and coating operations stack exhaust required under Condition D.3.5(a).

(2) maintain records of the results of the inspections required under Condition D.3.5(b).

(b) To document compliance with Conditions D.3.2, the Permittee shall maintain records in

accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Conditions D.3.2.

(1) The amount and HAP content of each material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The volume weighted HAP content of the coatings used for each month;

(3) The total HAP usage for each or month; and

(4) The weight of HAP emitted for each compliance period.

(c) To document compliance with Condition D.3.6(a), the Permittee shall maintain a log of weekly readings and quarterly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) To document compliance with Condition D.3.6(b), the Permittee shall maintain a log of daily readings and quarterly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

Space heaters, process heaters, or boilers using the following fuels

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

(b) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2,

(a) the particulate matter (PM) content of the grinding and machining operations shall be limited to 0.03 grain/dry standard cubic foot.

(b) the particulate matter (PM) content of all gaseous fuel fired steam generators shall not exceed 0.01 grains per dry standard cubic foot, and

(c) the particulate matter (PM) content of all liquid fuel fired steam generators shall not exceed 0.15 pounds per million Btu.

Compliance Determination

D.4.2 PM

The equipment for PM control shall be in operation at all times when the grinding process is in operation and exhausting to the outside atmosphere.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Mead Johnson and Company
Source Address: 2400 West Lloyd Expressway, Evansville, Indiana 47721
Mailing Address: 2400 West Lloyd Expressway, Evansville, Indiana 47721
Part 70 Permit No.: T163-7142-00015

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967
and Southwest Regional Office
208 NW Fourth Street
Evansville, IN 47708
PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Mead Johnson and Company
Source Address: 2400 West Lloyd Expressway, Evansville, Indiana 47721
Mailing Address: 2400 West Lloyd Expressway, Evansville, Indiana 47721
Part 70 Permit No.: T163-7142-00015
This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- C The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Mead Johnson and Company
Source Address: 2400 West Lloyd Expressway, Evansville, Indiana 47721
Mailing Address: 2400 West Lloyd Expressway, Evansville, Indiana 47721
Part 70 Permit No.: T163-7142-00015

9	Natural Gas Only
9	Alternate Fuel burned From:_____ To:_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Signature:
Printed Name:
Title/Position:
Phone:
Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Mead Johnson and Company
Source Address: 2400 West Lloyd Expressway, Evansville, Indiana 47721
Mailing Address: 2400 West Lloyd Expressway, Evansville, Indiana 47721
Part 70 Permit No.: T163-7142-00015
Facility: CSUP-4 (electrical generator)
Parameter: input diesel fuel oil
Limit: 25,643 gallons per 12 consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Mead Johnson and Company
Source Address: 2400 West Lloyd Expressway, Evansville, Indiana 47721
Mailing Address: 2400 West Lloyd Expressway, Evansville, Indiana 47721
Part 70 Permit No.: T163-7142-00015
Facility: Two (2) 750 kW and one (1) 1000 kW electrical generators
Parameter: hours of operation (which limits NOx to 39 tons per 12 consecutive month period
Limit: 2578 hours

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Mead Johnson and Company
Source Address: 2400 West Lloyd Expressway, Evansville, Indiana 47721
Mailing Address: 2400 West Lloyd Expressway, Evansville, Indiana 47721
Part 70 Permit No.: T163-7142-00015
Facility: entire source
Parameter: HAPs
Limit: 10 of one, 25 of a combination per 12 consecutive month period

YEAR: _____

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
	Single HAP	Combined HAPs	Single HAP	Combined HAPs	Single HAP	Combined HAPs
Month 1						
Month 2						
Month 3						

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Mead Johnson and Company
Source Address: 2400 West Lloyd Expressway, Evansville, Indiana 47721
Mailing Address: 2400 West Lloyd Expressway, Evansville, Indiana 47721
Part 70 Permit No.: T163-7142-00015

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked “No deviations occurred this reporting period”.

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________

Title/Position: ______________________________

Date: ______________________________

Phone: ______________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name: Mead Johnson & Company
Source Location: 2400 West Lloyd Expressway, Evansville, Indiana 47721
County: Vanderburgh
SIC Code: 2834, 2099
Operation Permit No.: T163-7142-00015
Permit Reviewer: Holly M. Stockrahm

On November 20, 2001, the Office of Air Quality (OAQ) had a notice published in the Evansville Courier, Evansville, Indiana, stating that Mead Johnson & Company had applied for a Part 70 Operating Permit to operate a pharmaceutical and nutritional product formulation plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Based on the comments received from the source on November 27, 2001, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted, the Table of Contents has been revised as necessary).

Comment 1:
Addition: Certificate of Operation #105-063-001, issued September 6, 2001. One (1) reciprocating diesel fuel oil fired emergency electrical generator identified as backup generator #4, used <500 hours per year to provide backup power to Bldg. 48 R & D Laboratory in case of power outage, capable of 500 KVA (405HP) output located north of Building 48 and south of Building 63, and exhausting at one (1) stack identified as stack 1. (Constructed in 2001)

Response to Comment 1:
The following description has been added to Section A.2:
One (1) reciprocating diesel fuel oil fired emergency electric generator, identified as backup generator #4 used to provide backup power to Bldg. 48 R & D Laboratory in case of power outage, capable of 500 KVA (405HP) output located north of Building 48 and south of Building 63, and exhausting at one (1) stack identified as stack 1. (Constructed in 2001)

Comment 2:
Page 6 of 48, A.2(h) end of last sentence should read, “and exhausting at one (1) stack, identified as stack 1.”

Response to Comment 2:
The description has been corrected as follows:
One (1) reciprocating diesel fuel oil fired emergency electric generator, identified as backup generator #3 used to provide backup power to the computer center in case of a power outage, capable of a maximum 750 kilowatt (KW) output, located north of building 52, and exhausting at one (1) stack~~s~~, identified as stack 1~~ and stack 2~~. (Constructed in 1992)

Comment 3:
Page 35 of 48, D.2.5(c) last sentence should read (d).

Response to Comment 3:
Page 35 of 48, D.2.5 has been corrected as follows:
~~(c)~~ (**d**) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. The new rule cite has been added to B.2 Permit Term to incorporate the Article 2 rule revisions that were adopted on October 3, 2001, and became effective on January 19th, 2002.

B.2 Permit Term [326 IAC 2-7-5(2)] **[326 IAC 2-1.1-9.5]**

2. B.12 Emergency Provisions (a)(b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology based emission limitations only.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation~~, except as provided in 326 IAC 2-7-16.~~

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(g) ~~Operations may continue during an emergency only if the following conditions are met:~~
~~(1)~~ If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~
~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

3. B.14 Multiple Exceedances has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed, because it conflicted with 40 CFR 70.6(a)(6).

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

4. B.14 Prior Permit Conditions Superseded was added to the permit to help clarify the intent of the new rule 326 IAC 2-1.1-9.5.

B.14 Prior Permit Conditions Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

5. Remove (b) from B.13 Permit Shield. Since B.14 Prior Permit Conditions Superceded has been added to the permit, it is not necessary for this statement to be in this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

6. EPA has stated that there cannot be a requirement in a federal permit to require a condition in a permit, then for IDEM, OAQ, to allow it not to be considered a deviation when the source does not perform it [see 40 CFR 70.6(a)(6)(i)]. IDEM, OAQ, may use enforcement discretion in these cases, but IDEM, OAQ, cannot create as exemption through the TV permit. In order to clarify the facility specific events that would not qualify as a deviation, IDEM, OAQ, has revised B.15 as follows:

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 NW Martin Luther King Jr. Blvd
Room 250
Evansville, Indiana 47708

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit,** shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

The ~~notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

(b) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

2. C.18 Compliance Response Plan - Failure to Take Response Steps (c)(2) "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed. Requests that do not involve significant changes to monitoring, reporting, or recordkeeping requirements may now be approved as minor permit modifications.

C.18 Compliance Response Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **a minor permit modification** to the permit, and such request has not been denied.

8. Part 70 requires any application form, report, or compliance certification to be certified by the

Responsible Official. IDEM, OAQ, has re-visited this issue with EPA. EPA requested that IDEM, OAQ, clarify C.9 so that the Permittee understands that the asbestos notification should be certified by the owner or operator and not the responsible official. IDEM, OAQ, has also changed C.16, it now requires a certification by the Responsible Official (R.O.) for the notification sent in response to non-compliance with a stack test. There are 3 conditions that EPA and IDEM agree do not need a Responsible Official certification; B.11, B.12, and C.9. B.11 & C.9, PMPs and stack test protocol, do not qualify as an application, report, or compliance certification, and therefore are not required to be certified. The emergency report is excused from certification because the source only has 2 days to submit it, and the same information will be certified when it is included in the Quarterly Deviation and Compliance Monitoring Report and the Annual Compliance Certification.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 NW Martin Luther King Jr. Blvd
Room 250

Evansville, Indiana 47708

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do ~~not~~ require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

9. EPA’s states that Part 70 does not allow an excuse from reporting failures. IDEM, OAQ, may use enforcement discretion, but cannot create an exemption through the permit. The condition has been re-organized to clarify it’s intent.

C.16 Compliance ~~Monitoring~~ **Response** Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to **prepare** ~~implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely~~

~~new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

~~(1) This condition;~~

~~(2) The Compliance Determination Requirements in Section D of this permit;~~

~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~

~~(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~

~~(5) A~~ **a** Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. **A** CRP~~'s~~ shall be submitted to IDEM, OAQ and Evansville EPA, upon request ~~and shall be subject to review and approval by IDEM, OAQ,~~ and Evansville EPA . The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee**, supplemented from time to time by the Permittee,** ~~and~~ maintained on site, and ~~is~~ comprised of:

~~(A)~~**(1)** Reasonable response steps that may be implemented in the event that ~~compliance related information indicates that~~ a response step is needed pursuant to the requirements of Section D of this permit; and **an expected timeframe for taking reasonable response steps.**

~~(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The** Permittee is ~~excused from taking~~ **not required to take any** further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment **and** ~~This shall be an excuse from taking further response steps providing that~~ prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

~~(d)~~**(e)** ~~Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.~~ **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

~~(e)~~**(f)** **Except as otherwise provided by a rule or provided specifically in Section D,** all monitoring **as** required in Section D shall be performed ~~at all times~~ **when** the ~~equipment~~ **emission unit** is operating, **except for time necessary to perform quality assurance and maintenance activities.** ~~If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~

~~(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time~~

~~in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

Indiana Department of Environmental Management
Office of Air Quality
and Evansville EPA

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**Mead Johnson & Company**
Source Location:	**2400 West Lloyd Expressway, Evansville, Indiana 47721**
County:	**Vanderburgh**
SIC Code:	**2834, 2099**
Operation Permit No.:	**T163-7142-00015**
Permit Reviewer:	**Holly M. Stockrahm**

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Mead Johnson & Company relating to the operation of a pharmaceutical and nutritional product formulation plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) natural gas fired boiler (using No. 2 distillate fuel oil as back up fuel) with low NOx burner and flue gas recirculation system identified as CSUP-1 (boiler 8), maximum capacity rated at 98.6 million British thermal units per hour fired with natural gas, rated at 93.9 million British thermal units per hour fired with No. 2 distillate fuel oil, maximum capacity rated at 80,000 lbs saturated steam per hour at 400 psig operating pressure and 400 to 450^0 F, located in building 66, and exhausting at one (1) stack identified as CSUP-S_1. (Constructed in 1998)

(b) One (1) natural gas fired boiler (using No. 2 distillate fuel oil as back up fuel) with low NOx burner and flue gas recirculation system identified as CSUP-2 (boiler 9), maximum capacity rated at 98.6 million British thermal units per hour fired with natural gas, rated at 93.9 million British thermal units per hour fired with No. 2 distillate fuel oil, maximum capacity rated at 80,000 lbs saturated steam per hour at 400 psig operating pressure and 400 to 450^0 F, located in building 66, and exhausting at one (1) stack identified as CSUP-S_2. (Constructed in 1998)

(c) One (1) natural gas fired boiler (using No. 2 distillate fuel oil as back up fuel) with low NOx burner and flue gas recirculation system identified as CSUP-3 (boiler 10), maximum capacity rated at 98.6 million British thermal units per hour fired with natural gas, rated at 93.9 million British thermal units per hour fired with No. 2 distillate fuel oil, maximum capacity rated at 80,000 lbs saturated steam per hour at 400 psig operating pressure and 400 to 450^0 F, located in building 66, and exhausting at one (1) stack identified as CSUP-S_3. (Constructed in 1998)

(d) One (1) diesel fuel oil fired emergency electric generator identified as CSUP-4, rated at 7.20 million British thermal units per hour (MMBtu/hr) or capable of maximum 750 KW output, located near the southeast corner of building 66, and exhausting at one (1) stack identified as CSUP-S_4. (Constructed in 1998)

(e) One (1) fixed roof tank with a maximum design capacity of 10,000 gallons identified as CSUP-F1, located east of building 66, and will be used to store petroleum products with a maximum vapor pressure of 0.009 psia at 68^0 F. (Constructed in 1998)

(f) One (1) reciprocating diesel fuel oil fired electric generator, identified as backup generator #1, used to provide backup power to the computer center in case of a power outage,

capable of a maximum 750 kilowatt (KW) output, located in building 5, and exhausting at one (1) stack, identified as stack 1. (Constructed in 1985)

(g) One (1) reciprocating diesel fuel oil fired electric generator, identified as backup generator #2, used to provide backup power to the computer center in case of a power outage, capable of a maximum 1000 kilowatt (KW) output, located south of building 8, and exhausting at one (1) stack, identified as stack 1. (Constructed in 1992)

(h) One (1) reciprocating diesel fuel oil fired electric generator, identified as backup generator #3 used to provide backup power to the computer center in case of a power outage, capable of a maximum 750 kilowatt (KW) output, located north of building 52, and exhausting at one (1) stacks, identified as stack 1 and stack 2. (Constructed in 1992)

(i) Eight (8) weigh stations, identified as 1 through 8, located in room 105 of building 9, each with PM controlled by a rotoclone, six (6) with hepafilter systems, with rotoclones located on the roof. (Constructed in 1997)

(j) Two (2) tablet coating systems, identified as 2025 and 2026, located in room 119 of building 9, controlled by two (2) dust collectors, identified as RTC 0032 and 0033, located on the roof. (Constructed in 1997)

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Space heaters, process heaters, or boilers using the following fuels
  (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

  (2) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour. (326 IAC 6-1-2)

(b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(c) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(d) The following VOC and HAP storage containers: Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(e) Refractory storage not requiring air pollution control equipment.

(a) Closed loop heating and cooling systems.

(b) Noncontact cooling tower systems with either of the following:
  (1) Natural draft cooling towers not regulated under a NESHAP.
  (2) Forced and induced draft cooling tower system not regulated under a NESHAP.

(c) Heat exchanger cleaning and repair.

(d) Paved and unpaved roads and parking lots with public access. (326 IAC 6-4)

(e) Asbestos abatement projects regulated by 326 IAC 14-10.

(f) Emergency generators as follows: Diesel generators not exceeding 1600 horsepower. (326 IAC 6-1-2)

(g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. (326 IAC 6-1-2)

(h) Vents from ash transport systems not operated at positive pressure.

(i) A laboratory as defined in 326 IAC 2-7(21)(D).

(j) Other activities or categories not previously identified:

Insignificant Thresholds:

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxides (SO2) = 5 lbs/hour or 25 lbs/day Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NOX) = 5 lbs/hour or 25 lbs/day Volatile Organic compounds (VOC) = 3 lbs/hr or 15 lbs/day

(1) Nutritional Lodige Wet Granulation (113) (mixing process involving powders and liquids) (326 IAC 6-1-2)
(2) Pharmaceutical Lodige Wet Granulation (112) (mixing process involving powders and liquids) (326 IAC 6-1-2)
(6) High Shear Mixer (111A) (mixing process involving powders and liquids) (326 IAC 6-1-2)
(7) Fluidized Bed Dryer (110A, 111, 109) (air drying of wet granulation) (326 IAC 6-1-2)
(8) Weigh Scales (105) (weighing of materials) (326 IAC 6-1-2)
(9) Lodige Dry Granulation (25) (mixing process involving powders and liquids) (326 IAC 6-1-2)
(10) Dump Room/Mixer (130/25A, 134/23A, 132/24A) (dumping and mixing of solid granulation) (326 IAC 6-1-2)
(11) Solids Chilsenator (131) (dry mixing of granulation) (326 IAC 6-1-2)
(12) Dry Chilsenator (126) (dry mixing of granulation) (326 IAC 6-1-2)
(13) Oncology Blending (116A) (dry mixing of granulation) (326 IAC 6-1-2)
(14) Oncology Encapsulating (116A) (capsulating of dry granulation) (326 IAC 6-1-2)
(15) Liquid Mix Tanks and Storage (117) (tanks for storage and mixing of liquids used in granulations.
(16) Tray Drying Ovens (114, 115A, 103) (ovens used to dry granulations)
(17) Sugar Coaters (133) (coating of tablets)
(18) Accela Coaters (105) (coating of tablets)
(19) Feed Room (103D) (granulation dump room for tableting room) (326 IAC 6-1-2)
(20) DRIAM Coaters and preparation (34/36) (liquid coating of tablets)
(21) Materials handling (109 A, B, C) (wet materials handled here)
(22) Central Vacuum System (serves tableting suites)
(23) Weigh Room (304) (weighing of powders via scales) (326 IAC 6-1-2)
(24) Dump Room (301, 303, 304, 305, 216, 212) (dumping of powders that feed mixing machine) (326 IAC 6-1-2)
(25) Inkjet Printer (210, 214, 24) (labeling of individual units with number for identification)
(26) Bottle Filling (214) (shipping box construction)
(27) Lasertechnic Printers (214) (labeling using laser printers)
(28) Steroid Tableting (125, 101) (tableting of granulation) (326 IAC 6-1-2)
(29) Steroid Blending (105) (mixing of granulation constituents) (326 IAC 6-1-2)
(30) Steroid Processing Room (103A) (dry blend and manual tableting) (326 IAC 6-1-2)
(32) Two (2) packaging lines (304A) (tablet packaging) (326 IAC 6-1-2)

(33) Pouch Filling Line (hopper-fed pouch filling line)

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) CP No. 163-8495-00015, issued on October 9, 1997.
(b) CP No. 163-9713-00015, issued on August 24, 1998.
(c) CP No. 163-10280-00015, issued on April 20, 1999.
(d) RP No. 015-003-001, issued on April 28, 1999.
(e) RP No. 015-005-001, issued on April 28, 1999.
(f) RP No. 015-006-001, issued on December 22, 1999.
(g) RP No. 015-009-001, issued on April 28, 1999.
(h) RP No. 015-009-002, issued on April 28, 1999.
(i) RP No. 015-009-003, issued on April 28, 1999.
(j) RP No. 015-009-004, issued on April 28, 1999.
(k) RP No. 015-009-005, issued on April 28, 1999.
(l) RP No. 015-009-006, issued on April 28, 1999.
(m) RP No. 015-009-007, issued on April 28, 1999.
(n) RP No. 015-009-008, issued on April 28, 1999.
(o) RP No. 015-009-011, issued on April 28, 1999.
(p) RP No. 015-009-012, issued on April 28, 1999.
(q) RP No. 015-033-001, issued on April 28, 1999.
(r) RP No. 015-033-002, issued on April 28,
(s) RP No. 015-033-003, issued on April 28, 1999.
(t) RP No. 015-061-001, issued on April 28, 1999.
(u) RP No. 015-063-001, issued on April 28, 1999.
(v) 015-041-001, issued on April 28, 1999.
(w) 015-045-001, issued on April 28, 1999.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(a) CP No. 163-8495-00015, issued on October 9, 1997.

This permit was for one (1) natural gas fired boiler, identified as boiler 7, which was to be used as backup in the event that any of the old coal fired units (boilers 3, 4, and 5, which have since been removed) failed before the three CSUP boilers (8, 9, and 10) in CP No. 163-9713-00015, issued on August 24, 1998, were installed and operated. This boiler was never constructed as per CP No. 163-10280-00015, condition D.1.4 (d) so the permit was/is invalid.

(b) RP No. 015-006-001, issued on October 24, 1990, RP No. 015-006-002, issued on October 24, 1990, RP No. 015-006-003, issued on August 26, 1992.

These permits were for coal fired boilers 3, 4, and 5, which were decommissioned and removed as per the schedule provided in CP No. 163-10280, Condition D.1.4 (e). These were replaced by CSUP boilers 8, 9, and 10 which were permitted by CP No. 163-9713-00015.

(c) Operation Permits

015-009-004 , R-015-009-005, R-015-009-006, R-015-009-007, 015-009-011, R015-009-012, R-015-033-001, R-015-033-002, R-015-033-003, R-015-041-002, R-015-003-001, 015-009-008, issued April 28, 1999,

These permits contain both 326 IAC 6-1 and 326 IAC 6-3 applicability, when only 326 IAC 6-1 applies to Vanderburgh county. Therefore, 326 IAC 6-3 applicability is deleted from the permits listed above.

Operation Permit
R-015-063-001, issued on April 28, 1999, incorrectly contains 326 IAC 6-3 applicability, therefore, 326 IAC 6-3 is deleted. 326 IAC 6-1 was not and should be applied due to its location in Vanderburgh County.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on November 12, 1996. A notice of completeness letter was mailed to the source on December 3, 1996.

Emission Calculations

Emission calculations for boilers CSUP-1, 2, 3, and the emergency electric generator CSUP-4 were taken from CP No. 163-9713-00015.
CSUP-4 Emergency Generator (PTE based on 500 hours):

	Pollutant			
	NOx	CO	SOx	PM10
Emission Factor	4.41 lb/MMBtu	0.95 lb/MMBtu	0.29 lb/MMBtu	0.31 lb/MMBtu
CSUP-4 Emergency Generator (PTE based 7.2 MMBtu/hr and 500 hours)	7.9 ton/hr	1.7 ton/hr	0.52 ton/hr	0.56 ton/hr

Emission calculations for the backup generators, #1, #2, and #3 using emission factors taken from AP42, Table 3.3.1 are as follows:

	Pollutant			
	NOx	CO	SOx	PM10
Emission Factor	4.41 lb/MMBtu	0.95 lb/MMBtu	0.29 lb/MMBtu	0.31 lb/MMBtu
#1 Generator (2.56 MMBtu/hr)	11.29 lb/hr	2.43 lb/hr	0.74 lb/hr	0.79 lb/hr
#2 Generator (3.75 MMBtu/hr)	16.54 lb/hr	3.56 lb/hr	1.08 lb/hr	1.16 lb/hr
#3 Generator (2.9 MMBtu/hr)	12.79 lb/hr	2.76 lb/hr	0.84 lb/hr	0.90 lb/hr
Total Emissions in lb/hr	45.03	9.7	2.95	3.16
Total Emissions in ton/yr	197	42	13	14

The PTE from:

(a) the weigh stations, throughput 729 lb/hr, with potential emissions calculated (using emission factor 0.02 lb PM/ton of material weighed provided by the company) as follows: PM = 729 lb/hr * 0.02 lb PM/ton * ton/2000 lb = 0.00729 lb PM/hr is negligible

(b) tablet coating (solids 17 lb/hr, alcohol 187 lb/hr, methylene chloride 187 lb/hr) are negligible.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	151
PM-10	151
SO_2	602
VOC	120
CO	59
NO_x	84

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of SO_2, VOC, CO, and NOx are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
CSUP-1	5.8	3.3	124.5	2.4	36.0	34.3	
CSUP-2	5.8	3.3	124.5	2.4	36.0	34.3	
CSUP-3	5.8	3.3	124.5	2.4	36.0	34.3	
CSUP-4	0.3	0.2	1.3	0.2	2.8	14.0	
CSUP-F1	-	-	-	< 1	-	-	< 1
backup generators, #1 - #3						39*	
Six (6) weighing scale rooms	0.03 gr/dscf						
Two (2) pharmaceutical weigh stations, identified as 7 and 8	0.03 gr/dscf						
One (1) tablet coating system	0.03 gr/dscf						
Entire source							< 10 single, < 25 combi-nation

*Pursuant to CP 163-2250-00015 issued in 1992, the back up generators are limited to 2578 hours of operation per year, which is equivalent to 39 tons of NOx per year.

Pollutant	HAPs Emissions (tons/year)
Arsenic	<1
Beryllium	<1
Cadmium	<1
Chromium	2
Mercury	<1
Manganese	<1
Nickel	<1
Formaldehyde	<1
Methylene Chloride	<10
TOTAL HAP	< 10 single, < 25 combination

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1999 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	42
PM-10	42
SO_2	315
VOC	117
CO	38
NO_x	70
HAP	< 10 single, < 25 combination

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Vanderburgh County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Vanderburgh County has been classified as attainment or unclassifiable for VOC and NOx. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) The three (3) natural gas fired (using No. 2 distillate fuel oil as back up fuel) 98.6 MMBtu/hr boilers, identified as CSUP-1, CSUP-2, and CSUP-3 are subject to the requirements of New Source Performance Standard, 40 CFR Part 60.40c through 60.48c, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. This rule requires that:

(1) SO_2 emissions shall be limited to five tenths (0.5) pounds per MMBtu of heat input during distillate oil firing or that the distillate oil sulfur content be limited to five tenths (0.5) percent by weight at all times including periods of start-up, shut-down and malfunction. The source will comply with this rule by accepting a federally enforceable emission limit of 0.3 pounds per MMBtu heat input when burning No. 2 distillate fuel oil in the 98.6 MMBtu per hour boilers.

(2) When burning No. 2 distillate fuel oil, opacity shall be limited to 20 percent as a 6-minute average, except for one (1) 6-minute period per hour limited to 27 percent opacity, and except during periods of start-up, shut-down and malfunction;

(3) Initial compliance testing for opacity and SO_2 when firing No. 2 distillate fuel oil;

(4) SO_2 emissions monitoring, unless the affected facility is subject to the SO_2 emissions standard of §60.42c(h) (1), (2), or (3); and

(5) record keeping and reporting as required by Subpart Dc, including quarterly reporting of fuel supplier certification information, fuel oil sulfur content by weight, and the calculated sulfur dioxide emission rate.

(b) The NSPS, 40 CFR 60, Subpart K, does not apply to the tank CSUP-F1 at this facility because it is smaller than 10,560 gallons ($40m^3$).

(c) Various NSPSes, 40 CFR 60, SOCMI rules, such as Subpart VV, Subpart III, Subpart NNN, Subpart RRR, do not apply to this source because it does not produce synthethic organic chemicals as an intermediate or final product.

(d) 40 CFR 61 does not apply, the Subpart and reason are as follows:
(1) Subpart C for Beryllium, the source does not process beryllium ore, beryllium oxides, or beryllium wastes,

(2) Subpart E for Mercury, the source does not process mercury ore, produce chlorine gas and alkali metal hydroxide, or incinerate landfill sludge,

(3) Subpart N, O, or P, for Arsenic, the source does not have a glass melting furnace, smelt copper, or produce arsenic.

(e) The NESHAPs, 40 CFR Part 63, Subpart GGG, (Pharmaceutical MACT) is not applicable to this source because it has accepted a source emission limit of 10 tons per year of a single HAP and 25 tons per year of a combination of HAPs.

(f) Various NESHAPs, 40 CFR 63, SOCMI rules, such as Subpart H and Subpart I, do not apply to this source because it does not produce synthethic organic chemicals as an intermediate or final product.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on November 12, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 (PSD Minor Limits)

Pursuant to 163-9713-00015, issued on August 24, 1998, and 326 IAC 2-2:

(a) NOx emissions from the 98.6 MMBtu/hr boilers identified as CSUP-1, CSUP-2 and CSUP-3 shall be limited to 0.08 pounds per MMBtu (lb/MMBtu) while burning natural gas only, (this alternate emission factor was tested and verified on November 9-12, 1999, and results in the PTE of NOx being 39 tons per year for each boiler),

(b) NOx emissions from the 93.9 MMBtu/hr boilers identified as CSUP-1, CSUP-2 and CSUP-3 shall be limited to 0.08 pounds per MMBtu (lb/MMBtu) while burning No. 2 distillate fuel oil only, (this alternate emission factor was tested and verified on November 9-12, 1999, and results in the PTE of NOx being 39 tons per year for each boiler) and

(c) The input diesel fuel oil of the electrical generator identified as CSUP-4 shall be limited to 25,643 gallons per 12 consecutive month period. This production limitation is equivalent to NO_X emissions of 4.4 tons per 12 consecutive month period, rolled on a monthly basis. Compliance with this limit ensures 326 IAC 2-2 does not apply.

Pursuant to

(g) Two (2) 750 kW and one (1) 1000 kW electrical standby generators shall be limited to 2578 hours of operation per 12 consecutive month period. This limitation is equivalent to NOx emissions of 39 tons per year. Compliance with this limit ensures 326 IAC 2-2 does not apply.

326 IAC 2-4.1

326 IAC 2-4.1 (Toxics) does not apply to this source because it is not a major source of HAPs.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of both VOC and NO_X. Pursuant to this rule, the owner/operator of this source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirements as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1-2 (Opacity Regulations - Visible Emission Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

Submittal of the natural gas certification for the 98.6 MMBtu per hour boilers (CSUP-1, 2 and 3) will indicate compliance with the opacity requirements when using natural gas.

State Rule Applicability - Individual Facilities

326 IAC 6-1-2 (Non-attainment area particulate limitations)

Pursuant to 326 IAC 6-1-2, the particulate matter (PM) content of the following equipment shall be limited to 0.03 grain/dry standard cubic foot:

(a) Eight (8) weigh stations, identified as 1 through 8, located in room 105 of building 9, each with PM controlled by a rotoclone, six (6) with hepafilter systems, with rotoclones located on the roof. (Constructed in 1997)

(b) Two (2) tablet coating systems, identified as 2025 and 2026, located in room 119 of building 9, controlled by two (2) dust collectors, identified as RTC 0032 and 0033, located on the roof. (Constructed in 1997)

(c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(d) One (1) diesel fuel oil fired emergency electric generator identified as CSUP-4, rated at 7.20 million British thermal units per hour (MMBtu/hr) or capable of maximum 750 KW output, located near the southeast corner of building 66, and exhausting at one (1) stack identified as CSUP-S_4. (Constructed in 1998)

(e) One (1) reciprocating diesel fuel oil fired emergency electric generator, identified as

backup generator #1, used to provide backup power to the computer center in case of a power outage, capable of a maximum 750 kilowatt (KW) output, located in building 5, and exhausting at one (1) stack, identified as stack 1. (Constructed in 1985)

(f) One (1) reciprocating diesel fuel oil fired emergency electric generator, identified as backup generator #2, used to provide backup power to the computer center in case of a power outage, capable of a maximum 1000 kilowatt (KW) output, located south of building 8, and exhausting at one (1) stack, identified as stack 1. (Constructed in 1992)

(g) One (1) reciprocating diesel fuel oil fired emergency electric generator, identified as backup generator #3 used to provide backup power to the computer center in case of a power outage, capable of a maximum 750 kilowatt (KW) output, located north of building 52, and exhausting at one (1) stacks, identified as stack 1 and stack 2. (Constructed in 1992)

326 IAC 6-1-2 (Non-attainment area particulate limitations)

Pursuant to 326 IAC 6-1-2,

(a) the particulate matter (PM) content of all gaseous fuel fired steam generators (CSUP-1, 2, and 3) shall not exceed 0.01 grains per dry standard cubic foot, and

(b) the particulate matter (PM) content of all liquid fuel fired steam generators (CSUP-1, 2, and 3) shall not exceed 0.15 pounds per million Btu. (Based on AP 42 factors, the steam generators have potential emissions less than 0.15 pounds per MM Btu, therefore no fuel limit is necessary.)

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The sulfur dioxide emissions from the 98.6 MMBtu per hour boilers (CSUP-1, 2, and 3), when No. 2 distillate fuel oil is used, shall be limited to 0.5 pounds per MMBtu heat input. This equates to an allowable distillate fuel oil sulfur content limit of 0.5%. Therefore, the sulfur content of the distillate fuel must be less than or equal to 0.5% in order to comply with this rule. The facility will comply with this rule by limiting distillate oil sulfur content to 0.3% or less.

326 IAC 7-2-1 (Sulfur Dioxide Reporting Requirements)

The 98.6 MMBtu per hour boilers (CSUP-1, 2, and 3) are subject to 326 IAC 7-2-1 (Reporting Requirements). This rule requires the source to submit to the Office of Air Quality upon request reports of calendar month or annual average sulfur content, heat content, fuel consumption, and sulfur dioxide emission rates in pounds per million Btu. The source will comply with the reporting requirements of 326 IAC 7-2-1 for boilers 8, 9 and 10 by submitting on a calendar quarter basis the parameters recorded pursuant to this rule.

326 IAC 8-1-6 (General Reduction Requirements for New Facilities)

The facilities at this source, boilers, generators, coating processes, weigh stations, are not subject to the provisions of 326 IAC 8-1-6 because potential uncontrolled VOC emissions are less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

326 IAC 8-4-3 (Petroleum Sources: Petroleum Liquid Storage Facilities)

The distillate no. 2 fuel oil tank, identified as CSUP-F1, is not subject to this rule because the tank capacity is less than 10,500 gallons.

Testing Requirements

No testing is required for any of the emission units at this source at this time. Testing was performed on November 9-12, 1999 for boilers CSUP-1, 2, and 3 and all three boilers were found to be in compliance.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate

compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. **Monitoring for PM for boilers:**
The boilers (CSUP-1, 2, and 3) burn only natural gas and, therefore, have no applicable compliance monitoring conditions for PM as the PM emissions are negligible. In lieu of monitoring, the source will certify that natural gas only is consumed in the boilers.

2. **Monitoring for PM control by baghouse (dry) and rotocyclone (wet):**
The weigh stations, identified as 1 through 8, (controlled by rotoclones) and the two (2) tablet coating systems, identified as 2025 and 2026, can filling, pouch filling, packaging, tablet forming, and emergency generators, have applicable compliance monitoring conditions as specified below:

(a) Visible emissions notations of the processes above shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(b) Parametric Monitoring for the dust collectors only:

(1) The Permittee shall take readings of the total static pressure drop across the dust collectors, as least once per week. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the dust collector shall be maintained within the range of 3 to 6 inches of water. The Preventive Maintenance Plan for the dust collector when the pressure reading is outside of this range for any one reading.

(2) An inspection shall be performed each calendar quarter of the dust collectors. Defective dust collectors shall be replaced. A record shall be kept of the results of the inspections and the number of dust collectors replaced.

(3) In the event that a dust collector's failure has been observed:

(A) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.

(B) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

(c) Parametric Monitoring for the water rotoclones only:

(1) The Permittee shall record the pressure of water to the rotocyclones at least once daily when the respective process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the water pressure rate shall be maintained within the range of 40 to 60 psi or a range established during the latest stack test.

(2) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the PM controls must operate properly to ensure compliance with 326 IAC 6-1 and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this pharmaceutical and nutritional product formulation plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T163-7142-00015.